

Ken West
Therma - Tru Corporation
108 Mutzfeld Road
Butler, Indiana 46721

Re: RR 033-12672
Response to Request for Review the Letter
Of August 28, 2000

Dear Ken West:

On October 4, 2000, a letter was submitted requesting the review of information related to the emission factors used for a sheet molding compound (SMC) line. According to permit 033-11605, Therma - Tru had to use a factor of 3% of the styrene introduced into the line being emitted into the air, unless it is demonstrated that a lower emission factor is appropriate. This letter is to show that a lower emission factor of 0.18% is appropriate.

The Office of Air Management (OAM) has reviewed this request and determined the following:

Therma - Tru should use the 0.18% factor to calculate styrene emissions from the SMC operations. However, OAM will also require the source to perform stack testing to prove the emission factor used here. These tests will be observed by the Compliance Data Section to verify their accuracy.

All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM. A test protocol shall be submitted no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34). The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM if the source submits to IDEM, OAM a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

If the company wishes to officially change their permit to reflect this change, they will need to make a significant permit modification to their Title V permit.

If you have any questions regarding these issues, please contact Donald Poole at 317-232-8327, or at 1-800-451-6027, Ext. 2-8327.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

drp
cc: Doyle Houser

